



**Livestock and Seed Program
Audit, Review, and Compliance Branch
Quality System Audit Report**

AUDIT INFORMATION

Applicant Name:	Marin Organic Certified Agriculture (MOCA)
Est. Number:	N/A
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Auditor(s):	Miguel A. Caceres
Program:	USDA National Organic Program (NOP)
Audit Date(s):	December 11, 2007 and January 3, 2008
Audit Identifier:	NP7030MMA
Action Required:	No
Audit Type:	Corrective Action Audit
Audit Objective:	To verify that corrective actions adequately address the non-compliances identified during the previous on-site Accreditation Renewal Audit
Audit Criteria:	<ul style="list-style-type: none">• 7 CFR Part 205, National Organic Program, Final Rule, dated December 21, 2000; Updated September 11, 2006
Audit Scope:	The company's submitted corrective actions.
Location(s) Audited:	Desk

Marin Organic Certified Agriculture (MOCA) submitted corrective actions dated July 26, 2007 which were received by the auditor on August 10, 2007. Additional documents were requested and received via mail on December 22, 2007.

FINDINGS

The corrective actions submitted by MOCA adequately addressed the four non-compliances identified during the previous on-site Accreditation Renewal Audit which was conducted May 1- 3, 2007.

NP7030MMA.NC1 – Adequately Addressed – NOP §205.103(a) states, “A certified operation must maintain records concerning the production, harvesting, and handling of agricultural products that are intended to be sold, labeled, or represented as “100 percent organic,” “organic,” or “made with organic...(b) Such records must: (2) Fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood and audited.” *There were no production records*



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*maintained by the poultry operation that was visited and none required of the applicant by MOCA. During the witness inspection the audit trail conducted on the eggs sold was based on estimates of how many hens the operations had at the time and how many eggs may have been harvested. **Corrective Action:** The operation was informed of the non-compliance and is now documenting how many hens are on the operation and has created a log to document how many eggs are harvested, culled, and sold.*

NP7030MMA.NC2 – Adequately Addressed – NOP §205.105 states, “To be sold or labeled as “100 percent organic,” “organic,” or “made with organic...must be produced and handled without the use of: (c) Nonagricultural substances used in or on processed products, except as otherwise provided in §205.605.” *The Marzyme Supreme product used by a processor was not properly reviewed and included the ingredients Sodium Benzoate and Caramel Color. Sodium Benzoate is not included in the National List and the Caramel Color was not verified as being obtained from a non-synthetic source. **Corrective Action:** The processor was notified of the non-compliance and replaced the Marzyme DS with Marschall Marzyme SupremeOrg DS. The label was submitted to MOCA for review and approval. Additionally, the non-compliance was discussed with field and management staff.*

NP7030MMA.NC3 – Adequately Addressed – NOP §205.403 (c)(1) states, “The on-site inspection of an operation must verify: (1) The operation’s compliance or capability to comply with the Act and the regulations in this part; (2) That the information, including the organic production or handling system plan, provided in accordance with §§ 205.401, 205.406, and 205.200, accurately reflects the practices used or to be used by the applicant for certification or by the certified operation; and (3) That prohibited substances have not been and are not being applied to the operation through means which...” *The witness inspections conducted verified that not all of the information required to be verified during the inspections was in fact verified. On the first 2 witness inspections, the inspectors did not verify with the client that the organic system plans accurately reflected the practices in use since they were not reviewed with the applicants. Additionally, during the witness inspections of the applicants:*

- *none of the storage areas or the barn were inspected;*
- *field number 2 where the organic system plan indicated potatoes were planted was not visited;*
- *the insides of the hen houses were never observed;*
- *the entire 160 acres that were certified were not observed; and*
- *the Ingredients used for the processor were not properly reviewed and resulted in the processor using a culture which contained milk that was not verified as certified organic.*

Corrective Action: The MOCA On-site Inspection forms were revised to include a check box to ensure the organic system plans are reviewed with the operations. The requirements on what must be verified during the on-site inspections were reviewed with the MOCA staff during a staff meeting. MOCA stated that the label of the product being used by the processor was reviewed and that it was a general label of what the product could contain and not the actual label of the product used. The product used did not in fact contain milk. The importance of reviewing labels and product ingredients was also discussed during the staff meeting. A copy of the minutes of the staff meetings were provided as verification.

NP7030MMA.NC4 – Adequately Addressed – NOP §205.504 states, “A private or governmental entity seeking accreditation as a certifying agent must submit the following documents and information to demonstrate its expertise in organic production or handling techniques... (a) Personnel. (1) A copy of the applicant’s policies and procedures for training, evaluating, and supervising personnel.” *The MOCA*



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procedures do not address procedures for evaluating the management team that makes the certification decision. Evaluation procedures only address conducting performance evaluations of inspectors.

Corrective Action: Procedures were revised to include an annual performance evaluation of the department heads by the County Administrative Officer and the County Board of Supervisors. Addendums to the annual performance evaluation forms were developed and submitted: 1) MOCA Department Head Review; and 2) MOCA Management Staff.